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## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Plaintiff,

STIPULATION ALLOWING RELOCATION OF

RESIDENCE

VS.

Defendant.

Defendant.

Defendant, Ed Costa hereby respectfully requests permission of this court to relocate his residence to Las Vegas, Nevada based on the following:

- 1) Defendant Ed Costa has determined that his wife and mother can continue to receive the same care they need for their medical conditions in Las Vegas, Nevada.
- 2) The desert climate is helpful for his wife's medical conditions and the warm dry air helps with the pain.
- 3) They can no longer afford to live in this area on their retirement incomes.

  The inexpensive housing in Las Vegas, Nevada works well for their budget.
- 4) Defendant has purchased a home in Las Vegas, Nevada located at 6739 Quopaw Way, Las Vegas, Nevada 89149, (702) 966-0845.
- 5) Ms. Faramand, Pretrial Officer for defendant has been notified of this request and has no objections to defendant relocating his residence to Las Vegas, Nevada. In addition, Ms. Faramand has notified the Pretrial Services Office in Las Vegas, Nevada and informed them of defendant's proposed move and they are ready to work with Ms. Faramand in supervising defendant.

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6) Jeff Nedrow, Assistant United States Attorney has been notified of defendant's request to relocate his residence to Las Vegas, Nevada and has no objections to this request. Based on the information above, defendant respectfully requests permission of this court to relocate his residence to Las Vegas, Nevada. Defendant would depart as soon as this proposed order is granted. Dated this 12<sup>th</sup> day of July 2011 Respectfully Submitted, /s/Robert W. Lyons Robert W. Lyons Attorney for Defendant It is Hereby Ordered: Dated: 7/13/11 Honorable Jeremy Fogel United States District Judge